

1     Joel E. Tasca  
2     Nevada Bar No. 14124  
3     David E. Chavez  
4     Nevada Bar No. 15192  
5     BALLARD SPAHR LLP  
6     1980 Festival Plaza Drive, Suite 900  
7     Las Vegas, Nevada 89135  
8     Telephone: 702.471.7000  
9     Facsimile: 702.471.7070  
10    tasca@ballardspahr.com  
11    chavezd@ballardspahr.com

*Attorneys for Goldman Sachs Bank USA*

UNITED STATES DISTRICT COURT

# DISTRICT OF NEVADA

Heather Farrell,

Plaintiff,

V.

Experian Information Solutions, Inc., and  
Goldman Sachs Bank USA,

## Defendants.

Case No. 2:21-cv-01761-JCM-DJA

**STIPULATION AND PROPOSED  
ORDER TO EXTEND TIME FOR  
GOLDMAN SACHS BANK USA TO  
RESPOND TO PLAINTIFF'S AMENDED  
COMPLAINT  
(First Request)**

Defendant Goldman Sachs Bank USA (“GS”) and Plaintiff Heather Farrell stipulate as follows:

19           1. The operative deadline for GS to respond to Farrell's Amended  
20 Complaint is February 15, 2022. ECF Nos. 17, 18.

21           2.       GS has requested, and Farrell has agreed to, an extension of this  
22 deadline up to and including March 17, 2022, to provide additional time for the parties  
23 to discuss resolution of Farrell's claims against GS.

24 3. The parties agree that there is good cause for this extension.

*[Continued on following page.]*

1           4. This is the first request for an extension, and it is made in good  
2 faith and not for purposes of delay.

3           Dated: February 14, 2022.

4           BALLARD SPAHR LLP

5           FREEDOM LAW FIRM

6           By: /s/ David E. Chavez

7           Joel E. Tasca  
8           Nevada Bar No. 14124  
9           David E. Chavez  
10          Nevada Bar No. 15192  
11          1980 Festival Plaza Drive, Suite 900  
12          Las Vegas, Nevada 89135  
13          (702) 471-7000  
14          (702) 471-7070 (fax)  
15          tasca@ballardspahr.com  
16          chavezd@ballardspahr.com

17          By: /s/ Gerardo Avalos

18          George Haines, Esq.  
19          Nevada Bar No. 9411  
20          Gerardo Avalos, Esq.  
21          Nevada Bar No. 15171  
22          8985 S. Eastern Ave, Suite 350  
23          Las Vegas, Nevada 89123  
24          (702) 880-5554  
25          (702) 385-5518 (fax)  
26          Ghaines@freedomlegalteam.com  
27          Gavalos@freedomlegalteam.com

28          *Attorneys for Defendant  
1           Goldman Sachs Bank USA*

2          *Attorneys for Plaintiff Heather Farrell*

3           Order

4           On the basis of good cause, IT IS ORDERED that the deadline for Defendant  
5 Goldman Sachs Bank USA to respond to Plaintiff Heather Farrell's Amended  
6 Complaint is extended up to and including March 17, 2022.



7           United States Magistrate Judge

8           Dated: February 15, 2022

9           BALLARD SPAHR LLP  
10          1980 FESTIVAL PLAZA DRIVE, SUITE 900  
11          LAS VEGAS, NEVADA 89135  
12          (702) 471-7000 FAX (702) 471-7070